



ORLEN

Polski Koncern Naftowy ORLEN
Spółka Akcyjna

Code of Ethics



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Our mission

Aiming to become the regional leader, we ensure long-term value creation for our shareholders by offering our customers products and services of the highest quality. All our operations adhere to 'best practice' principles of corporate governance and social responsibility, with a focus on care for our employees and the natural environment.

Our motto

Whenever you need us.

Key values of PKN ORLEN

■ Consistency in pursuing goals

- I am conscientious in performing my duties.
- I am determined to achieve my goals.
- I am committed to my work.
- I ask questions when I'm in doubt.

■ Cooperation

- I cooperate with others for the benefit of my company.
- I communicate with others in a clear and direct manner.
- By cooperating with others I enhance confidence-building.
- The success of the team is the most important thing.

■ Integrity

- I am honest to others and myself.
- I speak my mind openly.
- I follow the principles of the Code of Ethics.
- I take proper care of the company's property.

■ Professionalism

- I want to be an expert in my field.
- I strive for the highest quality.
- I respect customers and fellow employees regardless of their position.
- I develop my skills.

■ Responsibility

- I keep my word.
- I assume responsibility for my actions and for the team under my supervision.
- I don't make promises that I cannot keep.
- I always finish tasks that I started.

■ Entrepreneurship

- I identify myself with my job and my company.
- I am willing to take on new tasks.
- I take risks consciously.
- I am cost-aware.
- I am creative and flexible about changes.

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General principles

The Company participates in the shaping of proper economics, and social relations in the spirit of respect for the legal order of the countries in which it conducts its operations.

The Company recognises the need to respect the common rules of social interaction in the spirit of responsibility for the whole community.

The Company respects cultural values of the communities among which it conducts its operations and it tries to harmoniously achieve both its individual and social goals in the spirit of respect for human rights and concern for the common good.

The purpose of this Code of Ethics is to shape the proper culture of living, particularly the culture of work within the Company and between the Company and its environment.

The key values of PKN ORLEN set out the rules of conduct for all our employees. In situations which are not provided for in the Code of Ethics, they should be regarded as guidelines for making individual decisions.

Compliance with the law and social standards

PKN ORLEN obeys the laws of the countries in which it operates. All employees acting on behalf of the Company are obliged to respect the legal framework of a given country.

The Company follows the principles of Corporate Governance. These principles apply to all the bodies of the Company (General Assembly, Supervisory Board, Managing Board) and their relations with external persons and institutions.

The Company declares to respect customs and social practices of a given country.

Respect

In its operations PKN ORLEN follows the fundamental principles of human respect and dignity. The mutual respect among our staff has an impact on the Company's economic results. PKN ORLEN focuses first and foremost on the skills and professional qualities of its employees and contractors, declaring respect for nationality, race, religion and political views of all its employees, associates, customers and business partners.

Integrity

Both in its business and social activities PKN ORLEN follows the principle of integrity. In particular the Company and its representatives are obliged to keep their word and display honesty in

all relations with business and social partners.

Transparency

PKN ORLEN declares full information transparency which enables all the concerned parties to make a detailed assessment of the Company's standing, operating procedures and plans, while at the same time ensuring protection of the Company's confidential information. The right to receive information about the company is first of all granted to the owners and other stakeholders who under the law - by virtue of their capital contributions - are entitled to have access to all public information related to the Company.

Professionalism and high quality of products and services

In our operations we are professional and reliable. We make sure that our management mechanisms are of the highest standard. We apply a clear system of evaluation of our employees assessing their performance against the results they achieve.

Open communication

We provide conditions for a smooth exchange of views along all available channels so that our employees, customers and suppliers can deepen and enhance their contacts. We encourage open and honest communication within PKN ORLEN and with our customers and suppliers while at the same time protecting the Company's confidential information.

No political involvement

PKN ORLEN declares to be uninvolved in politics. The company refrains from engaging in political activities in the belief that this would conflict with the long-term interests of the Company and its shareholders.

Any attempts of exerting political influence on the employees of PKN ORLEN are to be reported to superiors and brought to the attention of the Supervisory Board.

PKN ORLEN acknowledges that the involvement in social and political activities serves the purpose of building a civil state and strengthens democracy. Our employees have the right to parti-

participate in political life as guaranteed by the law.

PKN ORLEN:

- does not support either financially or materially any political organisations;
- does not support any politician or political party;
- does not engage in any election campaigns of political parties or candidates for political office;
- conducts its business operations and personnel policy with a view to the Company's best interests.

PKN ORLEN can and should actively participate in the discussions conducted by political bodies such as the Government, Parliament and local authorities insofar as they concern the Company's operations and its employees.

PKN ORLEN's employees:

- engage in political activities as private individuals not as representatives of PKN ORLEN;
- may not use the Company's property (equipment, premises, a company car, telephone, etc.) or their working hours, during which they are supposed to perform tasks for PKN ORLEN, for the purposes of their political activities;
- are not allowed to run an election campaign or any other political activity at the Company's premises;
- must not exert any pressure on their subordinates or co-workers as part of their political activities.

Political activities of our employees are confined to the private sphere of their lives, however due to the possible conflict of interest, while making particularly important decisions (e.g. standing for a political office, holding a position in the party leadership) superiors should be informed thereof.

Striving for success

We set ambitious goals for the Company and its Employees, promoting innovation, knowledge acquisition, teamwork and the will to succeed.



Company and its environment

PKN ORLEN conducts and expands its business in harmony with the natural and social environment.

We feel responsible for the environment in which we work and we regard social responsibility as an inherent part of our operations.

Through partnership and dialogue, we try to take into consideration the good of all individuals, organisations and communities that may be affected by our activities.

Local communities

We feel part of the community in which we operate. Our sense of responsibility makes us voluntarily engage in activities in support of local communities. We strive to build long-term relationships with local communities based on partnership and mutual confidence.

PKN ORLEN:

- supports local initiatives based on the principle of public-private partnership and means to increase the quality of living of the population;
- analyses the long-term impact of its operations on local communities;
- engages in charity work helping the poor and the needy;
- promotes local communities by supporting initiatives of inter-sectoral partnership;
- encourages its employees to participate in charity work for local communities;
- actively participates in actions aimed fighting unemployment among the local population.

PKN ORLEN pursues the policy of sustainable growth combining economic success with a genuine concern for the natural and social environment.

Important!

- You have the right to participate actively in the life of the local community.
- If you have any ideas serving the purpose of creating a civil state, please share them so that our Company can help you to implement them.
- Encourage other employees to participate in activities which benefit local communities.

If you want to get involved in activities benefiting the local community, please contact the ORLEN Dar Serca Foundation - e-mail: fundacja@darserca.pl and the Company's Voluntary Service - e-mail: wolontariat.pracowniczcy@orlen.pl.



Natural environment

It is necessary to maintain a harmony between industry and the natural environment. The heritage that has been handed down to us by previous generations should be particularly cared for and protected.

Being aware of the impact of its operations on the natural environment, PKN ORLEN complies with the requirements of long-term sustainable development by implementing anti-pollution and environment protection processes and removing environmental damage caused by the Company's activities.

PKN ORLEN, as Poland's largest corporation and a regional leader has particular responsibilities towards environment. Therefore we consider ecology to be one of the most important criteria of the Company's social responsibility. Our goal is to achieve the best possible ecological neutrality of the Company's production plants and other organisational units towards their immediate environment. At the same time we take steps to minimize environmental impacts of the use of products manufactured by PKN ORLEN.

PKN ORLEN's employees:

- take care of the natural environment regardless of the place and type of work;
- comply with the Company's internal environmental policies;
- report every instance of environmental damage to their superior and the Company's Environmental Inspection Unit;
- join environmental protection activities; any pro-environmental ideas can be submitted at the Environment Protection Department;
- participate in environmental protection actions.

As a manager you are obliged to:

- popularise, control and enforce compliance with the PKN ORLEN's internal environmental regulations, particularly ISO 14001 Environment Management Standards;
- precisely define responsibilities of your own organisational unit and competences of the employees involved in environment protection activities;
- promote ecological awareness and responsibility of employees.

Ecological activities and initiatives of PKN ORLEN are set out in the Company's "Environmental Policy" – the primary internal document dealing with implementation of sustainable development and concern for the natural environment.

PKN ORLEN runs a Green Helpline: 024 365 44 99 where all environmental issues can be reported.

Every alarming incident reported or observed by employees or persons living in the vicinity of the Company's facilities shall be closely examined and the cause will be explained. Persons reporting such incidents shall receive detailed information from the Company's Environmental Inspection Unit.

PKN ORLEN provides all interested parties with access to information environmental impacts of the Company's operations. Such information is available at the Company's website at www.orlen.pl.



Company and its partners

Customers

Our customer's satisfaction is our priority. Our customers have the right to expect products and services of the highest quality.

High quality of products and services

PKN ORLEN shall:

- fulfil all its obligations towards customers;
- continuously apply controlling, corrective and preventive actions to detect any organisational or technical problems and eliminate unprofessional conduct;
- remove defective products;
- implement new technologies and continuously modernise the existing facilities and equipment;
- pursue the policy of innovation;
- actively co-operate with research and development centres.

PKN ORLEN's employees are obliged to:

- protect the Company's reputation and represent it properly;
- apply the principle of customer focus in their professional activities;
- make sure that the products sold to customers meet the quality requirements;
- provide professional and competent service, being kind, friendly and open to customers' needs and expectations both in direct contacts and when writing business correspondence.

Detailed information on the quality policy can be obtained from the Management Systems Officer.

PKN ORLEN assumes full responsibility for the products and services it provides. In case they do not meet the quality and safety standards, PKN ORLEN shall:

- investigate complaints in a timely manner;
- inform customers about the progress and results of complaint investigation;
- analyse the cause of a complaint and implement corrective measures.

In the event of any defects in the quality or quantity of purchased oil and non-fuel products or services provided at petrol stations, complaints shall be filed in accordance with the Procedures of Complaint Investigation on the basis of:

- *a filled in complaint form available at every point of sale;*
- *a written complaint addressed to PKN ORLEN;*
- *a complaint made by phone by calling 0 801 167 536 or sent by email to: nasz.klient@orlen.pl;*

In the case of complaints made by the customers of the wholesale sales network, complaints can be submitted in writing, by phone or by email to the organisational units responsible for sales of a given product.

Customer comments on our products and services give us an impulse for improvement and tailoring of our offer in order to meet customer needs and expectations.

Clear rules

Customers decide to buy our products of their own free will and according to signed agreements.

- Orders are completed in accordance with the current regulations and the terms and conditions of bilateral agreements. At the time of taking an order the terms of purchase, return of goods as well as mutual deadlines shall be made known to the customer.
- Every offer concerning an instalment purchase or unforeseen delay on PKN ORLEN's part must be compliant with the current regulations and the signed agreement.
- Customers shall be precisely informed about any additional costs, difficulties in completing planned deliveries.
- The physical assets of a customer shall be used in accordance with the provisions of the bilateral agreement between the customer and the Company.

Respect for customers

PKN ORLEN's employees shall:

- provide efficient and friendly customer service;
- be open to dialogue and seek possibilities of cooperation with customers;
- avoid any disrespectful words or conduct that would be incompatible with good manners;
- treat all customers equally regardless of their age, sex and race.

Reliable information

PKN ORLEN's employees shall:

- provide customers with complete information on the Company's products, services and activities except for the information which constitutes the Company's technical, technological, commercial or organisational secrets which, if revealed, might cause damage to the Company and the Company's interests, or which is protected under the regulations of the law;
- provide true and correct information on their activities, products and services;
- not abuse the customer's trust nor take advantage of their ignorance or lack of experience.



Information protection

PKN ORLEN's employees are obliged to do their best to protect all information that they may have access to in the course of their work and to obtain only such information as is reasonably necessary for them to perform their duties. Of particular concern is the information protected under the law and the Company's internal regulations issued on its basis as well as the relevant provisions of the agreements concluded with the Company's business partners.

Managers may not give their subordinates instructions which might affect the security of the Company's information and employees or of the companies and individuals that they do business with.

PKN ORLEN does not permit the copy and use of copyrighted and other proprietary materials without the prior written consent of their owner.

Remember!

- If you cooperate with other businesses using Internet technology, you are obliged to make sure that they implement appropriate and reliable systems of information security ensuring the integrity and confidentiality of transactions and payments.
- While conducting business with external customers, you should inform them about the security level of their personal and financial information and the information protection measures applied by our Company.

The detailed regulations and procedures concerning information protection are set out in the Rules of preparing and providing by PKN ORLEN of the information on performing information obligations of a public company and protection of confidential information and the Ordinance on protection of confidential information.

More detailed information can be obtained from the Classified Information Office.

Contractors

PKN ORLEN strives to build long-term partner relationships with its contractors.

PKN ORLEN meets its obligations.

Payments and other obligations are met:

- in a timely manner;
- according to the agreed terms and conditions.

In difficult or conflict situations we try to solve problems through dialogue with our contractors.

Our Company chooses suppliers and contractors according to free market criteria, i.e.:

- attractiveness of prices;
- quality of goods and services;
- adjustment to expectations and needs;
- reliability and professionalism;
- compliance with the law and regulations in force.

The Company's internal regulations governing the selection of suppliers and services provide for full transparency of activities carried out in this area.

PKN ORLEN's employees cooperating with the Company's contractors are obliged to:

- judge business partners solely on the basis of fair and objective criteria;
- familiarise business partners with our standards of conduct and thus make sure about the quality of the services they provide;
- inform their superior if breaks the law or is guilty of conduct which is a significant breach applied by the Company.

Accounting and business records

PKN ORLEN shall keep the accounting books and records of invoices and payments in a clear and accurate manner so that they provide a true and detailed representation of transactions and appropriation of funds.

It is strictly forbidden to make accounting entries which intentionally conceal or disguise the true nature of any transaction.

It is prohibited to provide undisclosed or unregistered funds or financial means for any purpose, make false payments or issue fictitious invoices, make false bookkeeping entries or produce dishonest reports.

Any accounting errors or irregularities must be immediately reported to superiors or the Ethics Compliance Officer.



Internal relations

Shareholders

PKN ORLEN strives to ensure a continuous growth of the company's value for its shareholders

PKN ORLEN applies the Principles of Corporate Governance which give the Company's shareholders:

- a right to be treated equally, proportionally to their capital contributions yet appropriately protecting the interests of minority shareholders in accordance with the law and as provided in the Articles of Association of the Company;
- a right to receive important information about the Company as provided under the law;
- a right to be protected from risks associated with unclear division of responsibilities and powers in the Company's governing bodies.

The right of shareholders to receive important information about the Company includes but is not limited to the following types of information:

- The Company's activities
 - the Company's articles of association
 - ownership structure
 - the Company's governing bodies
 - the structure of the Capital Group
 - important decisions of the Managing Board and the Supervisory Board
- Financial and capital information
 - current, periodic and annual reports
 - capital and financial investments
 - foreign acquisitions
- Products and services
 - types of products and services and their parameters
 - current wholesale prices of products as well as the Company's current pricing policy
 - technologies used
 - petrol station network
 - customer loyalty programmes
- matters of social importance

All financial information published in our reports is true and correct and complete.

Acting in its best interests and in compliance with the law and good practice, the Company releases information on significant events and decisions related to its business to the public through the media, organizing press conferences. Additionally the Company publishes such information on a current basis on its website at www.orlen.pl.

PKN ORLEN pursues an open information policy. Whenever possible, the Company provides comprehensive answers to questions about the activities of PKN ORLEN and companies of its Capital group. External release does not apply to the Company's confidential information, personal information, classified information, stock exchange information prior to their publication and trade secrets.

Should you have any further inquiries please visit our website: www.orlen.pl or contact the Office of Investor Relations - e-mail: ir@orlen.pl or the Press Office - e-mail: media@orlen.pl; centrumprasowe@orlen.pl.

Compliance with the above mentioned rules and other principles of corporate governance is vital to the security and stability of stock exchange transactions and important for all the interested parties: customers, employees and shareholders.

Information on the principles of Corporate Governance adopted by the Company with accompanying commentary is available at www.orlen.pl.



Employees

The Company's success and working conditions largely depend on the conduct of all its personnel. They also depend on the sense of responsibility for the Company and its development as well as a good atmosphere which combines hard work, sense of duty and loyalty towards the Company and one's superiors with readiness and willingness to cooperate with others. A friendly atmosphere of cooperation enables better use of the skills and capabilities of all the personnel both for the Company's benefit and for the successful personal development of every employee. It is vital that all the employees are concerned for the Company's reputation

PKN ORLEN declares to respect workers' rights, particularly those concerning:

- fair and safe working environment;
- equal opportunities for employment, promotion and career development in keeping with the company's development strategy;
- protection of privacy.

Fair and friendly working environment

We strive to achieve a fair and friendly working environment by introducing transparent working procedures and maintaining harmonious everyday interpersonal relations based on cooperation and commitment to the Company's interests.

Employees and associates of PKN ORLEN cannot be used by the Company to perform activities which are in conflict with the provisions of the Code of Ethics.

Giving instructions to employees from other organisational units without notifying their superiors is a violation of the ethical standards of PKN ORLEN.

Contradictory instructions given to employees by superiors at different management levels is unacceptable. In such a situation an employee has a right to refuse to follow such an instruction until the problem is resolved.

An employee of PKN ORLEN has a right to:

- refuse to follow an instruction which falls outside his area

- of expertise and scope of duties;
- ask for explanation of an instruction he does not understand;
- refuse to follow an instruction that violates the law.

PKN ORLEN does not accept any form of harassment, discrimination or humiliation of employees. We strive to create a working environment based on mutual tolerance and respect for others. Therefore any disrespectful conduct infringing upon the dignity of other people and harmful to their reputation will not be tolerated.

It is forbidden to:

- commit any form of mobbing: to humiliate, insult, defame or intimidate other people;
- commit any forms of sexual harassment
 - which might have impact on the conditions of employment, or
 - decisions regarding promotions, disciplinary sanctions, training opportunities, remuneration, etc.,
- use one's position in the Company to gain personal benefit or infringe upon other people's personal rights;
- disseminate information which infringes upon other people's personal rights;
- spread rumours or false information which might lead to conflicts and unbalance internal relations within the Company.

Any action infringing in any way upon the dignity of an employee, a candidate for an employee or any other person must be immediately reported to the Ethics Compliance Officer.

Managers are obliged to ensure an appropriate working atmosphere, and in particular to:

- treat employees as partners;
- carefully listen to the concerns of employees ensuring appropriate place and sufficient time for such a conversation;
- support their subordinates in difficult life situations which require special help;
- help applicants and newly engaged employees by paying proper attention to them, informing them about the Company and discussing conditions of their employment;
- find time to talk to an employee leaving the company regardless of the manner in which they leave;
- make best efforts to ensure that the way in which activities associated with resigning from a job are carried out are in compliance with the standards of ethical conduct;
- pay special attention to employees who go into retirement, informing them about the forms of social support and activities aimed at maintaining their integration and identification with the Company.



Equal opportunities for employment, promotion and career development

PKN ORLEN strives to create an atmosphere of confidence between the management and employees, based on fair and equal treatment for all regardless of sex, age, position, employment period, trade union affiliation, physical appearance and political views.

Recruitment, selection, performance assessment, career development, promotions and remuneration follow the principle and criteria of equal opportunities for all. PKN ORLEN gives equal treatment in terms of employment (concluding and terminating of contracts of employment, employment conditions, promotions and access to training for the purpose of improving professional qualifications) to all employees and job applicants regardless of their nationality, political views and religious beliefs.

An employee has a right to:

- know his scope of duties and the expectations of his superiors;
- receive fair and reliable assessment of his work;
- seek assistance in career development;
- have an open and constructive dialogue regarding his performance and awards.

When making decisions associated with the process of performance evaluation, promotions, recruitment, career development and use of training programmes, managers are obliged to:

- use fair criteria of assessing skills and achievements of employees;
- apply equal criteria for evaluating employees irrespective of their sex, age, employment period, physical appearance and trade union affiliation;
- communicate expectations and decisions concerning the role of an employee within his team and the entire Company;
- assist employees in their career development in accordance with the internal procedures of PKN ORLEN and applying the same rules to everyone;
- make decisions concerning recommendations for awards and commendations in strict accordance with the relevant regulations.

Protection of privacy

PKN ORLEN respects the privacy of its employees. The Company collects and stores only such information as is necessary for its business operations.

Employees have a right to:

- know what information the Company holds about them;
- have access to their personal records;
- demand that such information is kept confidential and will not be disclosed to unauthorized persons;
- refuse to take a psychological test if the questions trespass upon their privacy.

All employees are obliged to protect personal information of other individuals and if access to such information results from their duties they may not disclose it to unauthorized persons.

Conflicts of interest and corporate opportunities

Employees of PKN ORLEN and their next of kin cannot engage in competing business activities which might be harmful to the Company's interests or result in conflicts of interest. A conflict of interest occurs when an employee's private interests may have an impact on decision making.

It is particularly forbidden to engage in cooperation with PKN ORLEN's competitors and specifically:

- to provide consultancy services for such companies;
- to be employed at such companies or do commissioned work for them or hold positions in the management of a competing company;
- to own considerable stakes in a competing company;
- to make or influence decisions on entering into business relationships with a supplier of which an employee is a shareholder or for which he works or whose shareholder or owner is a member of the employee's family or a significant other.

It is also prohibited:

- maintain a superior/subordinate relation involving the next of kin.

Important!

- Inform your manager if the business partner employs a person who might influence decisions made by an employee of our Company on the basis of criteria which are not business-related.
- Report to your superior any relations with an external partner so as to exclude accusations of bias or unfair business practices;
- When in doubt ask the Ethics Compliance Officer for advice.

Attitude towards competitors

Collecting information on our competitors from legitimate sources to evaluate the relative merits of their products, services, and marketing methods is permitted under the law.

Practices such as industrial espionage, stealing or hiding one's identity to obtain confidential information from a competitor are prohibited.

Employees are not allowed to make disrespectful remarks about the business situation, financial standing and potential legal problems of competing companies in order to achieve a business advantage.

Authority

Only authorized employees are allowed to incur obligations on behalf of PKN ORLEN.

When making business decisions on behalf of the Company, employees should use their best knowledge and efforts so as to protect the Company's interests.

Abuse of the company's property, facilities and time

Responsibility for the Company, fairness and honesty as well as the economic spirit form the foundations of the proper use of working time, respect for the Company's property and facilities. Employees are obliged to display concern for the Company's property and to use it in such a way so as not to cause the Company to incur unnecessary costs.

PKN ORLEN's employees are not allowed to:

- abuse the Company's property (telephones, company cars, fax machines, photocopiers, facilities, products) for purposes other than those associated with performing job duties, however they may use such property in accordance with the Company's internal regulations;
- use the Internet and email for private purposes;
- conduct private business during working hours;
- use the entertainment allowance for purposes not connected with their work;
- sell clothes that bear the Company's logo.

Commercial software

PKN ORLEN uses commercial software as an instrument of professional work. Employees who use such software for illegal purposes will be subject to disciplinary sanctions.

Employees may use the software made available to them by the Company and shall treat it as an instrument of work. Any violation of this principle may form the basis for taking a disciplinary action.

Intellectual property rights

The Company has proprietary rights to materials and information that is related to PKN ORLEN and results from individual and collective work of its employees unless otherwise specified in separate agreements concluded with the employees.

Conduct outside workplace and working hours

Conduct outside of working hours is a private matter of every employee unless it has a negative impact on workplace safety, his ability to perform duties or the reputation of PKN ORLEN. Each case of improper conduct shall be reviewed individually so as to determine its impact on the interests and reputation of the Company and take appropriate disciplinary action.

Standard of dress and appearance

PKN ORLEN has adopted a specific code of dress that is suited to the activities of its employees.

- The standard of dress applies to all employees who because of the nature of their work are not required to wear uniforms.
- The standard of dress and appearance is part of the corporate culture.

PKN ORLEN's employees are obliged to:

- familiarise themselves with the Company's standard of dress and appearance;
- wear neat and appropriate attire.

Managers are obliged to:

- inform employees, especially those newly engaged, about the Company's standard of dress;
- reprimand employees who dress inappropriately while at work.

Important!

Your appearance has a major influence on the internal and external customers' opinion of yourself, your department and the entire Company.



Giving and receiving material benefits

The quality of our products and services is one of the criteria of cooperation with customers and business partners. PKN ORLEN shall not tolerate any actions which might affect the ability to make unbiased business decisions. PKN ORLEN's employees cannot accept material benefits for any services or tasks they perform in connection with their positions.

The above mentioned material benefits include:

- financial gratuities;
- services provided either free of charge or at a price below fair market value;
- objects of considerable value

A gift may be accepted if:

- it is of negligible value and in accord with the customary practice on a given market – including the relevant tax regulations;
- it has no influence on decision making and job performance;
- it does not oblige the recipient to repay favour;
- it is a promotional gift, a company souvenir, given to the recipient officially during a public event.

If possible, gifts should be unwrapped in the presence of other persons.

PKN ORLEN's employees are not allowed to offer material benefits to the Company's business partners, except for customary promotional gifts of negligible value.

Entertainment in the company of business partners

PKN ORLEN's employees may take part in entertainment events and informal meetings organised by our business partners unless it has an adverse impact on the Company's relationships and the transactions that are being carried out. When taking part in entertainment you are obliged to represent the Company in a proper and well-mannered way.

In dubious situations involving acceptance of material benefits or use of attractions offered to you, please ask

the Ethics Compliance Officer for advice.

Important!

- Try to conduct business talks in the presence of another person
- Make a brief memo of the meeting.
- If you have been offered a bribe, report it to your superior immediately and make a memo.

Safety and health

“Safe work environment that does not lead to the loss of health is the right of every human being.”

PKN ORLEN continuously strives to provide a safe and healthy workplace for its employees.

PKN ORLEN shall:

- continuously improve conditions of work, health and safety in accordance with the relevant legal regulations and standards;
- continuously improve methods of risk assessment and accident and occupational disease prevention;
- implement solutions to make work less strenuous;
- improve skills of its employees and promote activities aimed at improving working conditions;
- inform its personnel and the public about the Company's safety and health policy and its effects.

More detailed information on the Health and Safety policy can be obtained at the Office of the Health and Safety Manager.

If the employer does not provide an employee with protective equipment necessary to perform dangerous work, an employee can refuse to obey the instruction of his superior.

Employees and managers of PKN ORLEN are obliged to:

- act promptly to protect their lives and the lives of other people in danger;
- comply with the regulations, principles and standards which apply to their jobs;
- protect their health and safety by using protective clothing and equipment appropriate to the hazards to which they may be exposed;
- make proper use of the protective equipment;
- use appropriate tools for the intended purpose;
- report all violations of the health and safety regulations, accidents, injuries, diseases or oil spills that are hazardous to the environment and to warn people in the danger zone about the threat;
- comply with the quality standards of the products and services produced.

It is strictly forbidden to report for duty while under the influence of alcohol, drugs or other intoxicating substances.



Communication

Efficient interpersonal communication and understanding of the Company's strategies and objectives increases employees' commitment to their work and improves operational effectiveness.

PKN ORLEN's employees have a right:

- to receive current information the Company's strategies, plans and objectives;
- to be fully informed about their working environment, including projected changes which might have an impact on their career with the Company;
- to be fully informed about the assessment of their performance by their superiors;
- to express their own reasonable opinions on the way the Company operates and to submit their own proposals of improving the Company's operations and enhance its development.

Managers are obliged:

- to explain all issues concerning the Company's operations or, if unable to do, to direct an employee to a person who can provide satisfactory answers;
- to provide employees, as soon as possible, with complete information about their positions and duties;
- to provide employees with explanation of any changes in the internal regulations that apply to their job positions;
- to initiate cooperation between various organisational units of the Company;
- to cooperate with the Public Relations Office in order to ensure an efficient and effective information flow.

Internal relations

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Code of Ethics

Observance of the Code of Ethics

Promotion of the Code of Ethics, clarification of its provisions

Every employee of PKN ORLEN, regardless of their position in the organisational structure, is obliged to familiarise themselves with and obey the provisions of the Code of Ethics of PKN ORLEN.

Every employee shall receive a copy of the Code of Ethics.

The Code of Ethics is also available:

- at the company's website at www.orlen.pl;
- in the intranet;
- from your manager;
- at the Ethics Compliance Officer's office.

Every employee of PKN ORLEN has a right to receive explanation of any unclear provisions of the Code of Ethics, make comments and propose changes and amendments to the Code.

Every employee is entitled and ought to propose their own solutions to difficult problems, suggestions of how to eliminate ineffective procedures or inappropriate conduct that occur within the Company. Comments and suggestions should be directed to the Ethics Compliance Officer. They will be recorded and reviewed with a view to improving the corporate culture.

Managers are obliged to:

- engage in activities promoting the Code of Ethics and ethical conduct;
- promote individuals and solutions to be followed and themselves serve as an example of conscientiousness and commitment;
- make the Code of Ethics available to their employees and, at their request, explain its provisions;
- immediately respond to reports of any violations of the provisions of the Code of Ethics;

- monitor employees' compliance with all the principles of the Code of Ethics.

If you want to learn more about the application of the Code of Ethics, you can ask the Ethics Compliance Officer to point you to the Company's documents which contain detailed regulations or alternatively you can phone persons who are directly responsible for specific areas.

Ethics Compliance Officer

The Ethics Compliance Officer ensures compliance with the provisions of the Code of Ethics. He is a person of trust, elected for a three-year term and approved by the Company's Management Board.

The primary tasks of the Ethics Compliance Officer include: education and promotion of exemplary conduct and building corporate culture based on the highest ethical standards.

Additionally the Ethics Compliance Officer:

- in cooperation with the Business Conduct team develops an action strategy in the field of corporate culture and the Company's ethical policy;
- monitors compliance with the ethical principles;
- carries out intervention activities as regards persons who violate the provisions of the Code of Ethics;
- initiates actions aimed at promotion of the Code of Ethics and ethical conduct; organises trainings, information meetings, supports managers in the process of communication, publishes articles, etc.;
- maintains close contact with employees, keeps track of current problems of the Company.

„The Rules of electing the Ethics Compliance Officer” and “Tasks, responsibilities and powers of the Ethics Compliance Officer” are available in the intranet.



Supporting compliance with the provisions of the Code of Ethics

Every employee of PKN ORLEN is obliged to immediately report a breach or a suspected breach of the law and the provisions of the Code of Ethics so that preventive or corrective measures can be taken.

In the event of a breach of the provisions of the Code of Ethics, an employee should contact his superior who is obliged to listen to him and take action to investigate the reported irregularity.

If an employee does not trust his superior, he should do one of the following:

- personally inform the Ethics Compliance Officer about the problem or his suspicions;
- sent an email to an mailbox that guarantees anonymity to the sender;
- call the integrity helpline.

As part of the Company's "Open Door" policy, an employee may also request an appointment with the President of the Managing Board of PKN ORLEN.

An employee reporting a violation of the law can count on anonymity to protect them. The process of investigating a report will be carried out without disclosing the identity of the source of information.

Any person outside of the Company, who becomes aware of an act of misconduct on the part of our employees or any issue concerning the integrity of the Company, may report it to the Ethics Compliance Officer either personally or by email at ety-ka@orlen.pl, or by phone.

“Open Door” Policy

The “Open Door” policy means that superiors are available to talk to employees providing them with an opportunity of honest conversation during which they can count on their superior’s support and protection of the confidential nature of its subject matter. Implementation of these principles is the responsibility of managers at all levels.

Every manager is obliged to listen to an employee so that they can jointly decide the course of action to be taken in the event of an alleged violation of the provisions of the Code of Ethics.

As part of the Company’s “Open Door” policy employees may ask for an appointment with the President of the managing Board of PKN ORLEN.

Individual appointments with the President of the Management Board of PKN ORLEN can be arranged through the Board Office.



Non-compliance with the Code of Ethics

PKN ORLEN declares that:

- the employees and business partners who report a violation of the law or the Code of Ethics will be protected from any consequences which might result from their decision to disclose such misconduct;
- persons who infringe upon personal rights of the Company's employees and their business partners shall be subject to sanction in accordance with the law and the provisions of the Code of Ethics.

Exercising their freedom of conscience and freedom of speech and following the principles of the Code of Ethics, employees have a right and ought to report any violations of the standards of conduct to the Company's management.

Manager are obliged to listen to such reports and inform the relevant organisational unit so that they can be investigated and appropriate solutions can be worked out in accordance with the regulations of the law and the provisions of the Code of Ethics.

The principles contained in this Code of Ethics also apply to consultants, associates, contracting parties, agents and all other persons acting on behalf of PKN ORLEN. Any violation of the Code of Ethics on their part may result in the discontinuance of business cooperation and termination of the existing agreements.

